U.S. DISTRICT COURT DISTRICT OF VERMONT FILED

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONIA 1 1:37

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UNITED STATES OF AMERICA	BY CLERKE - (
v.	Criminal No. $5:22 - cr - 35 - l - d$
DANIEL RUIZ, aka "Peanut," and)
JOEL IVAN CAQUIAS AVILES,	j
Defendant.)

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about March 23, 2022, in the District of Vermont, the defendants DANIEL RUIZ, aka "Peanut," and JOEL IVAN CAQUIAS AVILES, and others, known and unknown to the grand jury, knowingly and willfully conspired to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841 (b)(1)(C) and 846)

COUNT TWO

On or about March 23, 2022, in the District of Vermont, the defendants DANIEL RUIZ, aka "Peanut," and JOEL IVAN CAQUIAS AVILES, knowingly and intentionally possessed with the intent to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841 (b)(1)(C); 18 U.S.C. § 2)

A TRUE BILL

FOREPERSON

NHKOLAS P. KEREST (JAO) United States Attorney Burlington, Vermont March 31, 2022